IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
v.	)	
	)	16 CR 476
GUSTAVO BELTRAN,	)	Judge Noelle C. Collins
	)	
	)	
Defendant.	)	

GUSTAVO BELTRAN'S MOTION TO CONTINUE DETENTION HEARING

NOW COMES Defendant, GUSTAVO BELTRAN, through his attorney, JOSHUA B. ADAMS, pursuant to 18 U.S.C. §3142(f)(2)(A)(B), and respectfully requests that this honorable court continue the detention hearing currently set in this matter for Thursday, December 15, 2016 at 1:00 p.m. until Monday, December 19 or Tuesday, December 20. In support of his motion, Mr. Beltran states the following.

1. On November 10, 2016, this honorable court granted counsel's motion to appear pro hac vice on behalf of Mr. Beltran in this matter.
2. On December 13, 2016, Mr. Beltran appeared in this honorable court for his initial appearance. The court set Mr. Beltran's detention hearing for Thursday, December 15 at 1:30 p.m.
3. Counsel has a sentencing hearing set for December 15, at 10:30 a.m. in the matter of *U.S. v. Todd Noble,* 15 CR 238, (Wood, J.).

4. The Bail Reform Act provides that upon good cause, a detention hearing may be continued for 5 days. §3142(f)(2)(A)(B).
5. Mr. Beltran's fiancé is traveling to St. Louis to attend his detention hearing, and is gathering the necessary paperwork to post real estate as a property bond in the event this honorable court grants Mr. Beltran a bond. Counsel requires the additional time to prepare this property as suitable collateral to serve as a secured bond.
6. Counsel respectfully requests that this honorable court reset Mr. Beltran's arraignment for either Monday, December 19, or Tuesday, December 20 in the afternoon.

CONCLUSION

WHEREFORE, Mr. Beltran respectfully requests that this honorable court reset his arraignment in this matter for Monday, December 19 or Tuesday, December 20 in the afternoon.

Respectfully submitted,

/s/ Joshua B. Adams
Joshua B. Adams
Counsel for Gustavo Beltran

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